

IN THE UNITED STATES DISTRICT COURT  
FOR THE DISTRICT OF DELAWARE

VERLIN ALEXANDER

-V-

RUTH ANN MINNER

GOVERNOR, DELAWARE

CARL DANBERG

ATTORNEY GENERAL, DELAWARE

DEFENDANT'S

C.A. NO. 07-041-JJF



Bb scanned

TO: JUDGE Joseph J. FARNAN, JR.

YOUR HONOR, I APOLOGIZE FOR ANY  
INTERRUPTION ON MY BEHALF; BUT I THOUGHT  
THAT YOU MIGHT LIKE A COPY OF THE DOCUMENT  
THAT I RECEIVED IN THE MAIL ON SEPTEMBER  
9, 2007

ALSO IF I MAY AT THIS TIME, INQUIRE  
ABOUT THE HABEAS CORPUS CASE THAT IS IN  
YOUR HANDS AND WAS SUPPOSE TO BE ANSWERED  
BY JUNE 15, 2007 AS YOU COMMANDED; BUT  
HAS NOT AS OF YET, AS FAR AS I KNOW.

I AM ASKING, IF YOU PLEASE, IS THERE  
ANYWAY THAT YOU MAY ENLIGHTEN ME ON  
WHAT IS GOING ON IN THE ABOVE MENTIONED  
HABEAS CORPUS CASE.

I APPRECIATE ANY RESPONSE THAT YOU  
MAY BE ABLE TO RESPOND TO, ON MY BEHALF

Respect Fully Submission  
VERLIN ALEXANDER

DATED: Sept. 10, 2007

Verlin Alexander

SBI. # 098778

B-Building, ANNEX

Dorm 1-8-Bottom

DELAWARE CORRECTIONAL CENTER

1181 PADDOCK ROAD

SMYRNA, DELAWARE 19977

1 OF 4

Awaiting Response

WM VERLIN ALEXANDER  
B-Building, Annex  
SBI# 098778 UNIT DORM 1-8-Bottom

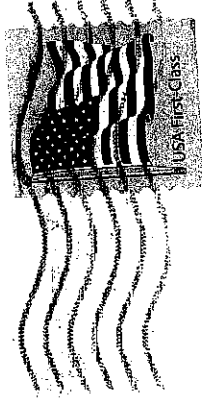
DELAWARE CORRECTIONAL CENTER

1181 PADDOCK ROAD

SMYRNA, DELAWARE 19977

WILMINGTON DE 197

11 SEP 2007 PM 1 L



Judge Joseph J. FARNHAM, JR.

c/o OFFICE OF THE CLERK

UNITED STATES DISTRICT COURT

844 N. KING STREET, LOCKBOX 18

WILMINGTON, DELAWARE

19801-3570

U.S.M.S.  
X-RAY

1980143813

**IN THE UNITED STATES DISTRICT COURT  
FOR THE DISTRICT OF DELAWARE**

VERLIN ALEXANDER,

Plaintiff,

v.

RUTH ANN MINNER, GOVERNOR,  
DELAWARE,

CARL DANBERG, ATTORNEY  
GENERAL, DELAWARE

Defendants.

C.A.No. 07-041-JJF

TRIAL BY JURY DEMANDED

**ANSWER**

Defendants, by and through their attorney, answer the civil complaint form as follows:

IV. Statement of claim. - Defendants are without sufficient information to form a belief as to the truth of these paragraphs.

**First Defense**

1. The complaint fails to state a legal claim for which relief can be granted.

**Second Defense**

2. The plaintiff has failed to properly exhaust his administrative remedies as required by law.

**Third Defense**

3. The matter is in whole, or in part, time barred under the appropriate statute of limitation, or repose or by some administrative time requirement.

**Fourth Defense**

4. The matter is barred by the Eleventh Amendment to the U.S. Constitution.

**Fifth Defense**

5. The district court lacks jurisdiction under Art. III, § 2, clause 2.

**Sixth Defense**

6. The complaint should be dismissed as service of process was improper or insufficient.

**Seventh Defense**

7. The Court lacks personal jurisdiction over defendants and the complaint should be dismissed.

WHEREFORE, the defendants ask for judgment in their favor for all that is just and proper, including dismissal of the action and assessment of costs against the plaintiff.

**STATE OF DELAWARE  
DEPARTMENT OF JUSTICE**

/s/ Marc P. Niedzielski  
Marc P. Niedzielski (# 2616)  
Deputy Attorney General  
820 N. French Street, 6<sup>th</sup> Floor  
Wilmington, DE 19801  
(302) 577-8324  
[marc.niedzielski@state.de.us](mailto:marc.niedzielski@state.de.us)

DATED: September 7, 2007

**CERTIFICATE OF SERVICE**

The undersigned certifies that on September 7, 2007, he caused two (2) copies of the attached document to be served on the following person by regular U.S. Mail:

**NAME AND ADDRESS OF RECIPIENT(S):**

Verlin Alexander  
SBI 098778  
DCC  
1181 Paddock Road  
Smyrna, DE 1977

STATE OF DELAWARE  
DEPARTMENT OF JUSTICE

/s/ Marc P. Niedzielski  
Marc P. Niedzielski, I.D. #2616  
Deputy Attorney General  
Carvel State Office Building  
820 N. French Street, 6<sup>th</sup> Floor  
Wilmington, DE 19801  
(302) 577-8400  
Attorney for Defendants



## Answers to Complaints

1:07-cv-00041-JJF Alexander v. Minner et al

PaperDocuments

U.S. District Court

District of Delaware

### Notice of Electronic Filing

The following transaction was entered by Niedzielski, Marc on 9/7/2007 at 1:25 PM EDT and filed on 9/7/2007

**Case Name:** Alexander v. Minner et al

**Case Number:** 1:07-cv-41

**Filer:** Carl Danberg  
Ruth Ann Minner

**Document Number:** 10

#### Docket Text:

ANSWER to Complaint by Ruth Ann Minner, Carl Danberg.(Niedzielski, Marc)

#### 1:07-cv-41 Notice has been electronically mailed to:

Marc P. Niedzielski marc.niedzielski@state.de.us, Jennifer.Mitchell@state.de.us

#### 1:07-cv-41 Notice has been delivered by other means to:

Verlin Alexander  
SBI# 098778  
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Smyrna, DE 19977

The following document(s) are associated with this transaction:

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